

JEFFREY W. KUYKENDALL
ATTORNEY AT LAW

127 King St.
Suite 208
Charleston, SC 29401

Phone: 843.790.5182
Facsimile: 866.733.1909
Jwkuykendall@jwklegal.com

August 13, 2021

Via Electronic Filing

Mr. David Butler
Chief Hearing Officer
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: *Application for Duke Energy Carolinas, LLC for approval of Smart Saver Solar as Energy Efficiency Program*
Docket Number 2021-144-E

Dear Mr. Butler

On behalf of the Solar Energy Industries Association (“SEIA”), I write this letter in support of Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP” and together with DEC, the “Companies”) letter requesting a Hearing Officer Directive consolidating and amending the procedural schedule filed on Friday, August 13, 2021 in the above-reference docket.

The original schedule and the schedule proposed by the Companies are as follows:

Current Schedule (assuming consolidation)			Proposed Schedule		
9/7/2021		DEC/DEP Direct Testimony	8/20/2021		DEC/DEP Direct Testimony
9/21/2021	14	ORS/Intervenor Direct Testimony	9/10/2021	21	ORS/Intervenor Direct Testimony
9/28/2021	7	DEC/DEP Rebuttal Testimony	10/1/2021	21	DEC/DEP Rebuttal Testimony
10/5/2021	7	ORS/Intervenor Surrebuttal Testimony	10/11/2021	10	ORS/Intervenor Surrebuttal Testimony (upon motion and showing that surrebuttal is warranted)
10/26/2021	21	Hearing (virtual)	10/26/2021	15	Hearing (virtual)
			11/9/2021	14	Proposed Orders

SEIA believes that the Companies' Proposed Schedule would allow adequate time for discovery and motions set by the Commission's regulations, as well as providing ample time to properly assess other parties' testimony, issue discovery, receive discovery, and utilize information obtained in discovery into limited rebuttal testimony. SEIA, as an intervenor party, appreciates additional time given to analyze and prepare surrebuttal testimony if warranted. We agree with the Companies that the revised schedule improves the procedural fairness of the proceedings and similarly note that the underlying tariff Application has been pending for a significant amount of time such that issues regarding timely discovery are not a concern.

As a practical matter, SEIA notes that the addition of a Proposed Order date on November 11, 2021, gives sufficient time for industry to implement new tariff programs impacted by the outcome of the above-referenced docket prior to the end of this year and the beginning of 2022. A market transition period of sufficient time is warranted in order to adequately prepare industry staff to properly and efficiently begin selling into a new tariff market. Having a time certain for Proposed Order helps create stability as the market transitions.

To reiterate, SEIA supports the Companies' letter requesting a Hearing Officer Directive consolidating and amending the procedural schedule filed on Friday, August 12, 2021, and we thank the Commission in considering this matter.

By copy of this letter, we are serving the same on the parties to this above-referenced proceeding.

Sincerely,

/s/ Jeffrey W. Kuykendall
Jeffrey W. Kuykendall
Attorney at Law
South Carolina Bar No. 102538
127 King St., Ste. 208
Charleston, SC 29401
Phone: 843.790.5182
Facsimile: 866.733.1909
Jwkuykendall@jwklegal.com

cc: Parties of Record (via electronic mail)
Heather Shirley Smith, Deputy General Counsel (via electronic mail)